

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

|                         |   |              |
|-------------------------|---|--------------|
| IN RE:                  | : | CHAPTER XIII |
|                         | : |              |
| SHARON C. ROBINSON      | : |              |
| TERRY J. ROBINSON       | : | 17-01910     |
| Debtor(s)               | : |              |
| <hr/>                   |   |              |
| JPMORGAN CHASE BANK,    | : |              |
| NATIONAL ASSOCIATION    | : |              |
| Movant                  | : |              |
|                         | : |              |
| vs.                     | : |              |
|                         | : |              |
| SHARON C. ROBINSON      | : |              |
| TERRY J. ROBINSON,      | : |              |
| Debtor(s)/Respondent(s) | : |              |
| CHARLES J. DEHART, III, | : |              |
| ESQUIRE, TRUSTEE        | : |              |
| Trustee/Respondent      | : |              |

**ANSWER TO MOTION FOR RELIEF**

NOW COME the Debtors, SHARON C. ROBINSON and TERRY J. ROBINSON, by and through their attorney, Charles E. Petrie, and respectfully answers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. Debtors have made or will make all payments required under the Mortgage.
8. Denied. The information set forth in this paragraph is in the sole possession of the Movant and is therefore denied.

9. No responsive pleading required.

WHEREFORE, Debtors respectfully request that Your Honorable Court dismiss Movant's Motion for Relief.

/s/ Charles E. Petrie  
CHARLES E. PETRIE  
3528 Brisban Street  
Harrisburg, Pennsylvania 17111  
(717) 561-1939  
Attorney for Debtors

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IN RE: : CHAPTER XIII

SHARON C. ROBINSON :  
TERRY J. ROBINSON : 17-01910  
Debtor(s) :

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JPMORGAN CHASE BANK,  
NATIONAL ASSOCIATION :

Movant :

:  
vs. :

SHARON C. ROBINSON :  
TERRY J. ROBINSON, :

Debtor(s)/Respondent(s) :  
CHARLES J. DEHART, III,

ESQUIRE, TRUSTEE :

Trustee/Respondent :

**CERTIFICATE OF SERVICE**

I, CHARLES E. PETRIE, ESQUIRE, do hereby certify that on this date, I served a true and correct copy of the within Answer, in the above-captioned matter upon the following individual(s), by United States first-class mail, postage prepaid, or by electronic means, addressed as follows:

JAMES C. WARMBRODT ESQUIRE  
KML LAW GROUP PC  
BNY MELLON INDEPENDENCE CENTER  
701 MARKET STREET SUITE 5000  
PHILADELPHIA, PA 19106

CHARLES J. DEHART III ESQUIRE TRUSTEE  
8125 ADAMS DRIVE SUITE A  
HUMMELSTOWN, PA 17036

DATE: 10/19/2017

/s/ Charles E. Petrie  
CHARLES E. PETRIE  
3528 Brisban Street  
Harrisburg, PA 17111  
(717) 561-1939  
Attorney for Debtors  
ID# 29029